

Med
Gulwater
9/11/85

5ED301-A0102

EPA		POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT		1. IDENTIFICATION	
				01 STATE	02 SITE NUMBER
				IL	980 899 306
II. SITE NAME AND LOCATION					
01 SITE NAME (Legal, common, or descriptive name of site)		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER			
Texas American Oil Corp.		W 1/2 of Sect 1 T-6-S, R-1-E			
03 CITY		04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE
Tyrone Township		IL	62864	Franklin	055
08 COORDINATES		09 LONGITUDE		08 CONG DIST	
38 02 01		089 03 35		22	
10 DIRECTIONS TO SITE (Starting from nearest public road)		Sesser 7.5' Quad		(254)	
See Attached Map					
EPA Region 5 Records Ctr.					
353697					
III. RESPONSIBLE PARTIES					
01 OWNER (if known)		02 STREET (Business, mailing, residential)			
Lennoth Greenwood		R.R. #2			
03 CITY		04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER	
Valier		IL	62891	UNK	
07 OPERATOR (if known and different from owner)		08 STREET (Business, mailing, residential)			
Texas American Oil Corp.		Box 747			
09 CITY		10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER	
Mt. Vernon		IL	62864	UNK	
13 TYPE OF OWNERSHIP (Check one)					
<input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL					
<input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)					
<input type="checkbox"/> A. RCRA 3001 DATE RECEIVED: _____ MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (RCRA 103 G) DATE RECEIVED: _____ MONTH DAY YEAR <input checked="" type="checkbox"/> C. NONE					
IV. CHARACTERIZATION OF POTENTIAL HAZARD					
01 ON SITE INSPECTION					
<input type="checkbox"/> YES DATE _____ MONTH DAY YEAR <input checked="" type="checkbox"/> NO					
BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR					
<input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify)					
CONTRACTOR NAME(S): _____					
02 SITE STATUS (Check one)		03 YEARS OF OPERATION			
<input type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input checked="" type="checkbox"/> C. UNKNOWN		BEGINNING YEAR _____ ENDING YEAR _____			
		<input checked="" type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED					
Oily Waste (Toxic) Heavy Metals (Soluble/Toxic/Persistent)					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION					
Ground Water (Population/Environment) Surface Water (Environment)					
V. PRIORITY ASSESSMENT					
01 PRIORITY FOR INSPECTION (Check one if high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)					
<input type="checkbox"/> A. HIGH (inspection required promptly) <input checked="" type="checkbox"/> B. MEDIUM (inspection required) <input type="checkbox"/> C. LOW (inspect on time available basis) <input type="checkbox"/> D. NONE (No further action needed, complete current disposition form)					
VI. INFORMATION AVAILABLE FROM					
01 CONTACT		02 OF (Agency/Organization)		03 TELEPHONE NUMBER	
				()	
04 PERSON RESPONSIBLE FOR ASSESSMENT		05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Rich Lange		IEPA	HSCS	(217) 782-6760	09 10 85
				MONTH DAY YEAR	



I HIGHLY VOLATILE
J EXPLOSIVE
K REACTIVE
L INCOMPATIBLE
M NOT APPLICABLE

EPA FORM 2070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
IL 40 980899306

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED 3,591.6 04 NARRATIVE DESCRIPTION
Highly soluble brine waste placed for disposal in unlined lagoon. This practice has impacted private wells at similar facilities.

01 ☒ B SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED Unk 04 NARRATIVE DESCRIPTION
Ground-water discharge to Surface Water / Area subject to possible flooding

01 ☐ C CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ D FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ E DIRECT CONTACT 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☒ F CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED Unk 04 NARRATIVE DESCRIPTION
Loss of production (Ag land) & damage to soil structure has been noted at similar sites.

01 ☒ G DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED 3591.6 04 NARRATIVE DESCRIPTION
(See J following) (See 05 other following)
See A above

01 ☐ H WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ I POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

IL 08089936

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☒ J. DAMAGE TO FLORA 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION The near sterilization of soils (>5 acres), Attributed to increased soil salinity, has been noted at other similar sites.
(See F Above) (See 05 other following)

01 ☐ K. DAMAGE TO FAUNA 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include number(s) of SOPC#s)

01 ☐ L. CONTAMINATION OF FOOD CHAIN 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED

(Spills, runoff, standing liquids, leaking drums)

03 POPULATION POTENTIALLY AFFECTED _____ 04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION Site was infrequently inspected by regulatory agencies, Facility has now been backfilled making illegal dumping hard to detect.

☒ 05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL OR ALLEGED HAZARDS
Removal of soils by brines is deemed leading cause of soil erosion in several IL counties.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 3,591.6

IV. COMMENTS

Texas American Oil Corp
Address Unreported
Mt Vernon IL 62864

Information as appears
on EIRIS (C-4)

V. SOURCES OF INFORMATION (Cite specific references e.g. state files, sample analysis, reports)

S.I.A. study

EXECUTIVE SUMMARY

This site has been placed in the ERRIS data base as a result of its selection for Phase II evaluation during the federally funded Surface Impoundment Assessment (SIA) study of 1980. During ERRIS placement the operator name and business address were utilized from the SIA which results in deviations from ERRIS for actual site location, Part I section II items 02 through 08 of form 2070-12. This use of operator name and address has also led to one (1) ERRIS listing representing, in actuality, from one (1) to one hundred eight (108) actual brine pits at an equal number of separate locations.

Some considerable effort has been expended to select the site with highest, Phase II SIA, pollution potential where multiple sites are represented by a single ERRIS listing. One must keep in mind that the Phase II SIA represents no more than 7 percent of the brine pits identified in Illinois. Phase I identified more than 3200 pits where Phase II evaluated a random selection of less than 220. One must also maintain a realization that phase II pollution potential was determined by bench top study with little or no actual site visitation or monitoring.

Minimal to no file information exists on this site beyond that contained in Phases I and II of the SIA. There is no direct evidence of hazardous waste disposal at this site beyond the potentially hazardous constituents of Illinois Basin brines, but with only annual inspections by Illinois Mines and Minerals staff relevant to oil production practices and recent backfilling of most brine pits in Illinois, disposal of off site material of unknown nature is possible. A literature review and laboratory analysis of samples from two other sites indicate concern for contamination of groundwater/surface water by Sodium, Sulfate, Chloride etc. (Non-Hazardous Constituents), concern for heavy metals (i.e., Chrome, Vanadium, Barium) and long chain hydrocarbons.

A question arises as to the addressability of the heavy metals by CERCLA when one considers 40 CFR section 300.6 "Definitions - Federally Permitted Release (i)" and Section 101(10) of CERCLA. The statement "and which are reinjected" seems to allow CERCLA action, but interpretation and clarification by USEPA legal staff seems required. The long chain hydrocarbons would appear to be included in the exclusion given to crude oil and fractions thereof under 40 CFR section 300.6 "Definitions-Hazardous Substance" and 101(14) of CERCLA.

A medium priority has been assigned due to the potential impact of this site on groundwater in a rural area where private wells are generally the sole source for potable water. Similar sites have impacted private wells to a point requiring users to seek alternative sources for drinking water. A site inspection should be scheduled to verify/update owner-operator information and gain more thorough site specific information.

RML:bf/22

